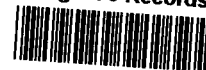


Sauget Area 2 Sites Group

EPA Region 5 Records Ctr.



208797

January 10, 2004

Nabil Fayoumi
Remedial Project Manager
USEPA
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604-3590

RE: Sauget Area 2

Deliver by Overnight Mail

Dear Nabil:

Attached is the Sauget Area 2 Sites Group monthly report for Sauget Area 2, as required under Section 2.4 of our Administrative Order by Consent. If you have any questions, please call.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Smith", written over a horizontal line.

Steven D. Smith
Project Coordinator

cc: Sandra Bron - Illinois EPA
Mike Coffey - U.S. Fish & Wildlife
Steve Davis - Illinois Department of Natural Resources
Peter Barrett - CH2M Hill
SA2SG File

SAUGET SITES - AREA 2
MONTHLY PROGRESS REPORT
For December 2003

Key Actions on the Support Sampling Plan

The SA2SG received conditional approval of the RI/FS Support Sampling Plan on May 6th, 2002.

On May 20th, 2002 the SA2SG submitted draft-revised pages to the SA2SG Support Sampling Plan.

The SA2SG submitted a proposal to modify the Aquatic Sampling and Risk Assessment protocols on May 20th, in line with the discussions held on April 24th.

Fieldwork on the R.I. sampling began in late May with mobilization activities. Actual sampling began the first week of June.

Sampling activities continued during July, on or ahead of schedule. Many tasks were completed including Bedrock Monitoring Wells, Soil Gas Sampling, Waste Characterization Borings, and Leachate Well installation.

During July discussions continued as to how the Mississippi River sampling program should be modified.

During August 2002, the fieldwork for the site continued on schedule. The Piezometer installation, alluvial aquifer sampling and seep sampling tasks were completed. Additionally, the remaining boundary and anomaly trenches located in the South portion of Site Q were completed during August as well. Air sampling began at the proposed sampling locations during the end of August, and will continue into the beginning of September. Development of the leachate and bedrock wells began at the end of August and will continue through the beginning of September

Tasks completed during September include the monitoring and additional development of the leachate and bedrock wells. Fieldwork and sampling of the waste, soil, groundwater, and air is essentially complete. Surface run-off samplers are in place to capture samples from future rain events.

On September 17th, the SA2SG submitted a proposed Addendum 2 to Volume 3 of the SSP. This Addendum spells out the recommended changes to the Mississippi River sampling program.

The EPA, Illinois EPA and SA2SG met on September 24th to discuss several issues, including the river sampling and some minor recommended changes to the terrestrial ecological sampling plan. Verbal agreement was reached on these issues and the SA2SG was instructed to make several minor changes to the proposed Addendum (reflecting changes to the river sampling program) and to move forward with preparations to carry out this work this year.

On September 25th, the EPA approved the proposed modifications to Volume 4 of the SSP related to the terrestrial biota sampling and related soil samples.

On October 1, 2002 the EPA approved Addendum 2 to Volume 3 of the Support Sampling Plan. This Addendum specifies the surface water, sediment and aquatic biota-sampling program.

The terrestrial biota sampling was completed during October, 2002 based on the approved sampling plan. Collected samples were shipped to the labs for appropriate analysis.

The surface water, sediment and aquatic biota sampling program was completed during November. Samples have been sent to appropriate laboratories for analysis.

The EPA announced that Nabil Fayoumi would be the Remedial Project Manager for the Sauget Area 2 Sites, replacing Mike Ribordy.

A meeting was held on December 12th, 2002 with the United States EPA, Illinois EPA, and CH2M Hill. A presentation was made reviewing the soil, waste, air, water, and groundwater sampling programs that have been completed during 2002. While the SA2SG does not expect to have all data received and validated until April, agreement was reached to meet in February to begin reviewing preliminary data maps.

2003

A meeting was held on February 25th, with the United States EPA, and CH2M Hill. Various issues related to the sampling were discussed. A decision was made to monitor the area (of the former ponds) in the south section of Site Q until June of 2003, and then revisit the issue of whether any additional sampling is necessary.

A meeting was held on March 25th with the United States EPA and CH2M Hill. An overview of the Data Report map formats and the ecological data was presented.

The Data Report was submitted on March 27th, 2003.

A meeting was held on April 29th with the United States EPA and CH2M Hill. An overview of the ecological data was presented as well as an in-depth discussion of the data validation success. URS has reviewed the current data base and concludes that no data gaps have been identified which would prevent them from carrying out the RI / FS.

The Data Validation Report was submitted on May 1, 2003 as planned.

A meeting was held on June 3rd with the USEPA, IEPA and CH2M Hill. The results of the clam bioaccumulation study showed no significant accumulation. Also the group resolved the TRVs to be considered in the ecological risk assessment.

The EPA monthly meeting was held on July 15th, 2003 to review the status of the Human Health and Ecological Risk Assessments. Preliminary lists of Chemicals of Potential Concern were reviewed for each of the five sites.

Both the Draft Human Health Risk Assessment and the Draft Baseline Ecological Risk Assessment were submitted on schedule at the end of August.

A monthly meeting was held with U.S. EPA, Illinois EPA, and CH2M Hill on October 8th, 2003. The results and conclusions of both the Human Health Risk Assessment and the Ecological Risk Assessment were reviewed and discussed.

A monthly meeting was held with U.S. EPA, Illinois EPA, and CH2M Hill on November 18th, 2003. An overview of the Alternatives Array and preliminary conclusions of the Remedial Investigation / Feasibility Study was presented and discussed.

December 2003

On December 17th, 2003 Solutia Inc filed for reorganization under Chapter 11 bankruptcy protection. Solutia announced to the SA2SG that they would no longer be managing or financing the former Monsanto Company environmental liabilities assigned to Solutia under the 1997 Distribution Agreement.

One or more of the SA2SG companies (not including Solutia) requested and obtained agreement from the U.S. EPA to delay the submittal of the RI/FS until January 31st, 2004.

Data Submittal

No data was submitted during the month.

Actions or Plans Scheduled for Next Month

Submittal of the Remedial Investigation / Feasibility Study.

Future Target Dates:

Draft Remedial Investigation / Feasibility Study

- January 31st, 2003